

December 14, 1990

Mr. Robert E. Swale, RPM
Mail Code 5HS-11
U.S. EPA, Region V
230 South Dearborn
Chicago, Illinois 60604

RE: Chemical Groupings for Risk Assessment
American Chemical Services NPL Site
Griffith, Indiana
Project # 60251

Dear Mr. Swale:

A conference call was held among U.S. EPA, Warzyn, and PRPs on Monday, December 10, 1990 to resolve several continuing uncertainties regarding the handling of tentatively identified compounds (TICs) in the Risk Assessment. The purpose of this letter is to memorialize the agreements from that conference call.

Warzyn submitted the list of TICs at the Site to ECAO on October 3, 1990 with a request to provide guidance regarding evaluation of TICs in the ACS risk assessment. It was anticipated that guidance could have included assigning toxicity values for those chemicals and compounds which have no formal value already assigned, or simply providing guidance more qualitative in nature. A partial listing was provided to Warzyn by ECAO on November 30, 1990 by photofax. When Warzyn asked why a complete list or procedure was not provided, it was explained that providing toxicity values for 400 TICs was beyond the mission of ECAO.

The conference call was set up among Robert Swale (U.S. EPA RPM), Pat VanLeeuwen (Toxicologist, Region V Technical Support Group), and Kevin Domack (Warzyn). Steven Seigel (U.S. EPA), Andrew Perellis (PRPs), and Peter Vagt (Warzyn project coordinator) also were a part of the conference. The following summarizes Warzyn's understanding of U.S. EPA's preferred approach:

- It is beyond ECAO's responsibilities and capabilities to provide general guidance and/or toxicity values for the TICs at the Site.
- According to U.S. EPA region V toxicologist, it is appropriate to group the chemicals which have similar toxicity characteristics and, if possible, assign a single toxicity value for all members of the group. It



is possible that TIC groups may already be represented by a chemical at the site that has a toxicity value. The groupings must be scientifically based, but different groupings could be equally valid.

- Warzyn will develop a list of groupings, based on available toxicological data, and provide it to Pat VanLeeuwen for review by 9 a.m., December 17, 1990.
- Warzyn will meet with Pat VanLeeuwen at 1 p.m., December 17, to receive U.S. EPA input, and agree on a final list and approach for addressing all chemicals and compounds in the Risk Assessment.

Warzyn is committed to delivering each of the Feasibility Tasks on schedule during the next three months. We will be working on Task 3, Detailed Analysis of Alternatives between now and February 11, 1991. As you know, meaningful analysis of the alternatives is not possible without a thorough assessment of the Site Risks. Or in other words, we need to have the Risk Assessment completed in-house by mid-January to proceed with Task 3 of the FS on schedule. In addition, the RI/FS completion time-frame will not allow us to backtrack, so we need U.S. EPA assurance that our proposed groupings and toxicity assignments for the numerous TICs at the Site will still be acceptable for the findings of the FS.

The chemical groupings are being completed by Warzyn's technical staff and will be provided by 9 a.m. December 17, 1990, for Pat VanLeeuwen's review. Warzyn will attend the 1 p.m. meeting on December 17 at the U.S. EPA Region V office. We look forward to meeting and resolving the remaining issues on Monday. Please call me at 708/691-5058 if you have any questions.

Respectfully Submitted,

WARZYN ENGINEERING INC.

A handwritten signature in black ink, appearing to read "P. J. Vagt".

Peter J. Vagt, Ph.D.
Project Coordinator

cc.: A. Perellis

251LASPV/KD/PRP

